

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SC SJ HOLDINGS LLC, *et al.*

Debtors.¹

Chapter 11

Case No. 21-10549 (JTD)

(Jointly Administered)

Related Docket No. 71

**CERTIFICATION OF COUNSEL REGARDING ORDER UNDER BANKRUPTCY
CODE SECTION 502(c) AND BANKRUPTCY RULE 3018 ESTIMATING
ACCOR'S CLAIM FOR FEASIBILITY PURPOSES**

The undersigned, counsel to the debtors and debtors in possession (the “Debtors”) in the above-captioned cases, hereby certifies the following:

1. On June 10-11, 2021 and June 17, 2021, the Court conducted a hearing on the *Motion of Debtors for Order Under Bankruptcy Code Section 502(c) and Bankruptcy Rule 3018 Estimating Maximum Amount of Contingent and Unliquidated Claim of Fairmont Hotels & Resorts (U.S.) Inc.* [Docket No. 71] (the “Motion”).

2. On June 29, 2021, the Court issued its ruling on the Motion. The Court directed the parties to confer and submit an appropriate form of order consistent with the Court’s ruling.

3. Attached hereto as Exhibit A is an *Order Under Bankruptcy Code Section 502(c) and Bankruptcy Rule 3018 Estimating Accor’s Claim for Feasibility Purposes* (the “Proposed Order”). The parties have conferred and have agreed to the Proposed Order.

4. The Debtors respectfully request that the Proposed Order be entered at the earliest convenience of the Court.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: SC SJ Holdings LLC (5141) and FMT SJ LLC (7200). The mailing address for both Debtors is 3223 Crow Canyon Road, Suite 300 San Ramon, CA 94583.

Dated: July 12, 2021
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

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